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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWIN GEOVANY SALAZAR-GIRON,

Defendant.

Case No. 2:25-mj-00181-NJK

**Stipulation for an Order  
Directing Probation to Prepare  
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United States Attorney, and Clay Plummer, Special Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public Defender, counsel for defendant EDWIN GEOVANY SALAZAR-GIRON, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the

PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this \_\_\_\_4th\_\_\_\_ day of April, 2025.

Respectfully Submitted,

RENE L. VALLADARES  
Federal Public Defender

SIGAL CHATTAH  
United States Attorney

/s/ Joanne L. Diamond  
JOANNE L. DIAMOND  
Assistant Federal Public Defender  
Counsel for Defendant  
EDWIN GEOVANY SALAZAR-  
GIRON

Clay Plummer  
CLAY A PLUMMER  
Special Assistant United States Attorneys

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Prepare a Criminal History  
Report**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 7th day of April, 2025.



HONORABLE NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE